

## **REMARKS**

### **Claim Rejections – 35 U.S.C. § 102**

The Examiner has rejected claims 1-5, 7-11, 13-18, and 20 under 35 U.S.C §102, as being anticipated by U.S. Patent No. 6,243,774 B1 to Eide et al. (“Eide”). For the reasons set forth below, Applicant asserts that the cited reference fails to teach or render obvious Applicant’s invention as claimed in claims 1-5, 7-11, 13-18, and 20.

Eide discloses a method “of managing computer resources [to]... facilitate concurrent maintenance operations by automatically re-associating existing resources in a computer... with appropriate hardware devices installed into the computer after a concurrent maintenance operation has been performed.” (Eide abstract lines 1-6) “To map the resource to a hardware device, a location identifier, a device type identifier and a device identifier are provided. The location identifier provides an indication of where the associated hardware device is located in the computer...” (Eide column 9, lines 7-11) Eide discloses a resource data structure (Eide Figure 2, item 40) that includes information about the resource in question with a location identifier, a device type identifier, and a resource identifier.

With respect to independent claim 1 in the presently claimed invention, Applicant teaches and claims “A method comprising identifying a device by a unique identifier, obtaining the unique identifier, and using the unique identifier in conjunction with a mapping table, wherein the mapping table contains at least a column containing a plurality of unique identifiers of devices coupled to a column containing a plurality of

updateable addresses of drivers specific to each device, to obtain an address of a driver for the device.” The mapping table associates unique device identifiers with corresponding addresses pointing to device drivers specific to each device. The mapping table efficiently couples every individual device identifier present in the system to the every corresponding driver address per device. It is not limited to coupling one device location to one device driver type as is the resource data structure in Eide.

Examiner explicitly states in the latest office communication mailed on February 13, 2004 that “Eide’s table also shows... the mapping of the resource to hardware device, location identifier and device identifier. And this mapping is being done for every resource and every device in the system.” While Examiner likens Eide’s “resource data structure” (Eide column 9, line 1) to Applicant’s mapping table, there is a fundamental difference that Examiner fails to point out. Where Eide’s resource data structure is a structure specifically designed to store information about a single device, Applicant’s mapping table is an index to a plurality of devices in the system. Applicant’s mapping table is one data structure meant to act as a centralized index lookup table for multiple devices and their associated drivers. Eide might very well utilize one resource data structure for each device in the system, but in no way does he disclose any process of centralizing these data structures into one contiguous table that would be used to look up a plurality of devices. Rather, Eide’s implementation is per device and, thus, there is no centralized concept for all devices referred to whatsoever in Eide’s method. Therefore, it is inherently obvious that Eide’s resource data structure is fundamentally different from

Applicant's centralized mapping table index of a plurality of devices and their respective driver address locations.

Even if Examiner is correct in assuming that a number of Eide's resource data structures would be implemented, one for each device in the system, that implementation would be entirely different from one centralized mapping table. In order to implement Eide's method for every device in a system would require the same number of resource data structures as there were devices in the system. Each resource data structure would be a discrete structure and the required plurality of these discrete resource data structures would in no way remotely resemble Applicant's centralized mapping table that stores data for a plurality of devices and their driver addresses. The most obvious fundamental difference is that Eide's method would require N number of resource data structures for N devices in the system, whereas Applicant's method would require 1 mapping table only for N devices in the system. Systems with a plurality of devices would require a fundamentally different implementation between Eide's method and Applicant's method. Thus, because Eide does not teach the presently claimed invention, Applicant respectfully submits that Eide does not anticipate claim 1.

Claims 2-5 are dependent upon independent claim 1. Thus, for at least the same reasons advanced above with respect to independent claim 1, Applicant respectfully submits that Eide does not anticipate claims 2-5.

In regard to independent claims 7 and 14, Eide does not anticipate Applicant's invention for the same reason as independent claim 1. Again, Applicant's centralized mapping table for a plurality of devices is fundamentally different than Eide's resource

data structure for one and only one device. As such, Eide does not in any way disclose a mapping table, which is fundamental to Applicant's invention. Thus, because Eide does not teach the presently claimed invention, Applicant respectfully submits that Eide does not anticipate claims 7 and 14.

Furthermore, claims 8-11 and 13 are dependent upon independent claim 7. Thus, for at least the same reasons advanced above with respect to independent claim 7, Applicant respectfully submits that Eide does not anticipate claims 8-11 and 13.

Additionally, claims 15-18 and 20 are dependent upon independent claim 14. Thus, for at least the same reasons advanced above with respect to independent claim 14, Applicant respectfully submits that Eide does not anticipate claims 15-18 and 20.

As such, Eide does not teach or anticipate Applicant's invention as claimed in pending claims 1-5, 7-11, 13-18, and 20. Applicant respectfully requests withdrawal of the 35 U.S.C. 102 rejection of claims 1-5, 7-11, 13-18, and 20.

### **Claim Rejections – 35 U.S.C. § 103**

The Examiner has rejected claims 6, 12, and 19 under 35 U.S.C §103(a) as being unpatentable over U.S. Patent No. 6,243,774 B1 to Eide et al. ("Eide") in view of Internet Engineering Task Force ("Task Force"), Simple Service Discovery Protocol/1.0, Operating without an Arbiter, October 29, 1999. For the same reasons set forth above in regard to Eide in view of the response to the 35 U.S.C §102 rejection, Applicant asserts

that the cited references fail to teach, suggest, or render obvious Applicant's invention as claimed in claims 6, 12, and 19.

Claim 6 is dependent upon independent claim 1. Thus, for at least the same reasons advanced above with respect to independent claim 1, Applicant respectfully submits that Eide and Task Force, taken alone or in combination, do not render this dependent claim obvious.

Claim 12 is dependent upon independent claim 7. Thus, for at least the same reasons advanced above with respect to independent claim 7, Applicant respectfully submits that Eide and Task Force, taken alone or in combination, do not render this dependent claim obvious.

Claim 19 is dependent upon independent claim 14. Thus, for at least the same reasons advanced above with respect to independent claim 14, Applicant respectfully submits that Eide and Task Force, taken alone or in combination, do not render this dependent claim obvious.

Thus, Eide and Task Force do not teach, suggest, or render obvious Applicant's invention as claimed in pending claims 6, 12, and 19. Applicant respectfully requests withdrawal of the 35 U.S.C. 103(a) rejection of claims 6, 12, and 19.

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If there are any additional charges, please charge Deposit Account No 02-2666.

If a telephone conference would facilitate the prosecution of this application, the

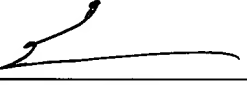
Examiner is invited to contact Michael J. Mallie at (408) 720-8300.

Respectfully submitted,

BLAKELY, SOKOLOFF, TAYLOR & ZAFMAN

Date: \_\_\_\_\_

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